

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America  
v.  
Thomas Lee McKinney

Case: 2:22-mj-30043  
Assigned To : Unassigned  
Assign. Date : 1/28/2022  
Case No. CMP: USA v MCKINNEY (MAW)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

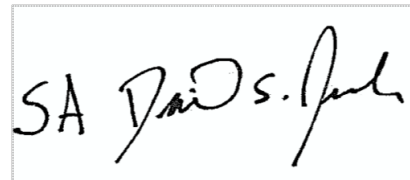
On or about the date(s) of January 26, 2022 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(g)(1)

*Offense Description*  
Felon in Possession of Firearm

This criminal complaint is based on these facts:  
See attached affidavit.

☒ Continued on the attached sheet.



*Complainant's signature*

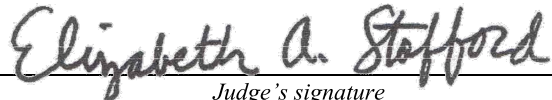
Special Agent David S. Jacobs

*Printed name and title*

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: January 28, 2022

City and state: Detroit, MI



*Judge's signature*

Elizabeth A. Stafford, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Special Agent David S. Jacobs, being first duly sworn, hereby depose and state as follows:

1. I have been employed as a Special Agent with the Federal Bureau of Investigation (FBI) since July 2017. I am currently assigned to the Detroit Field Office-Oakland County Resident Agency.

2. Before working for the FBI, I was a police officer with the Brown Deer (WI) Police Department for approximately six years. I have participated in numerous state and federal investigations including but not limited to; bank fraud, wire fraud, embezzlement, aggravated identity theft, access device fraud, Hobbs Act robbery, extortion, murder-for-hire and shooting investigations. Because of my involvement in these and other investigations, I have sworn to a number of federal search and arrest warrants.

3. I am submitting this affidavit in support of a criminal complaint alleging that Thomas Lee MCKINNEY; DOB (\*\*/\*\*/1975) has violated Title 18, United States Code Section 922(g)(1), Felon in Possession of a Firearm. The facts in this affidavit are based on my personal knowledge and/or information provided by other law

enforcement officers and/or other persons with knowledge of this investigation. This affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, therefore, it does not include all facts known to law enforcement related to this investigation.

4. On January 26, 2022, a federal search warrant was executed by FBI agents and task force officers at MCKINNEY's residence: 11\*\*\* Northlawn Street, Detroit, Michigan 48204, which is located in the Eastern District of Michigan. This court authorized the search warrant (case number 19-mc-51402-5.)

5. During a search of MCKINNEY's residence pursuant to the search warrant, FBI agents and task forces officers located a CLERKE 1<sup>st</sup>, .32 caliber Smith & Wesson revolver bearing serial number 073078 in MCKINNEY's bedroom at 11\*\*\* Northlawn Street, Detroit, Michigan, that was loaded with five cartridges.

6. Per engraving on the firearm, the CLERKE 1<sup>st</sup>, .32 caliber Smith & Wesson (S&W) revolver was manufactured by CLERKE Technicorp of Santa Monica, California. Information located during an internet query using the terms, "CLERKE 1<sup>st</sup> .32 caliber S&W"

confirmed the firearm was at one time manufactured in California. There is no indication the CLERKE 1<sup>st</sup> .32 caliber S&W was ever manufactured, produced, or had parts sourced in or from Michigan. Thus, said firearm has previously travelled in or affected interstate or foreign commerce.

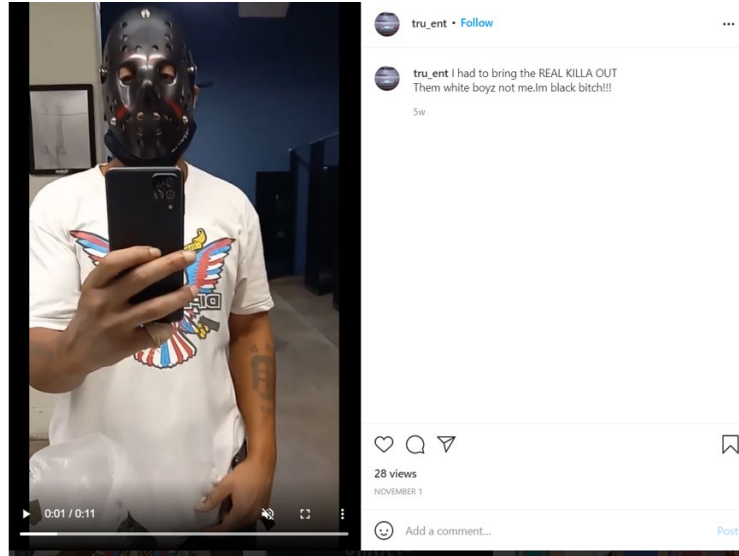
7. MCKINNEY's mother, LJ, was present during the execution of the search warrant. Prior to locating the firearm, LJ told FBI Agents she believed a firearm was in MCKINNEY's bedroom. LJ thought MCKINNEY may have acquired the firearm from a previous girlfriend.

8. After his arrest, MCKINNEY was held in the back of a police vehicle. While in the vehicle, MCKINNEY asked an FBI agent and task force officer what he was being arrested for. MCKINNEY was under arrest pursuant to a federal arrest warrant for Bank Fraud and Aggravated Identity Theft. MCKINNEY was also told his residence would be searched pursuant to a federal search warrant. MCKINNEY asked if he could be charged with anything that was found in his residence. An FBI Agent replied, "yes." MCKINNEY then freely and openly stated he had a .32 caliber handgun concealed behind a mask that was hanging in his bedroom.

9. The CLERKE 1<sup>st</sup> .32 caliber S&W was located in a bedroom of the residence that LJ identified as MCKINNEY's. The firearm was located on a wall hanging behind a black mask, just as MCKINNEY described. Identifying documents including a Michigan ID card that bore MCKINNEY photo and name and assorted pieces of mail and correspondence also bearing MCKINNEY's name were located in the bedroom where the firearm was located.



10. The following screenshot was located during this investigation. It shows MCKINNEY wearing the same black mask that the CLERKE 1<sup>st</sup> .32 caliber S&W was located behind on the wall in his Bedroom.



## **RELEVANT CRIMINAL HISTORY**

11. A computerized criminal history and Michigan Department of Corrections records for MCKINNEY show the following felony convictions:

- a. Convicted of felony carrying a concealed weapon on 09/29/1993 (Detroit Records Court case no: 9300856501), sentenced to three years' probation;
- b. Convicted of felony assault with intent to murder and felony firearm on 09/18/1996 (Third Circuit Court case No: 9600120401), sentenced to 8 to 20 years' confinement for the assault and two years for the firearm offense;
- c. Convicted of felony controlled substance on 02/18/2018 (Third Circuit Court case No: 1700923101 possess (cocaine,

heroin or another narcotic) less than 25 grams, sentenced to two years of probation.

**CONCLUSION**

12. Based on the facts set forth in the preceding paragraphs, I believe probable cause exists to conclude that Thomas Lee MCKINNEY, a convicted felon, knowingly possessed a firearm in violation of Title 18, United States Code Section 922(g)(1). As such, I respectfully request that a criminal complaint charging Thomas Lee MCKINNEY with violating Title 18, United States Code Section 922(g)(1) Felon in Possession of a Firearm be issued by this court.



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Special Agent David S. Jacobs  
Federal Bureau of Investigation

Sworn to before me and signed in my presence on this 28th day of January 2022.

  
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ELIZABETH A. STAFFORD  
UNITED STATES MAGISTRATE JUDGE